

February 7, 2020

Michael Calhoon
TEL: (202) 639-7954
FAX: (202) 585-1096
michael.calhoon@bakerbotts.com

VIA ECF AND FEDEX

The Honorable Jesse M. Furman
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Re: Homeward Residential, Inc. v. Sand Canyon Corp., 12-cv-5067 and 7319 (JMF/JLC)

Dear Judge Furman:

I write pursuant to Section 6 of the Court's Electronic Case Filing Rules & Instructions and Your Honor's Individual Rules of Practice respectfully to seek leave to file under seal certain materials in connection with Defendant Sand Canyon Corporation's Opposition to Plaintiff's Motion to Exclude Certain Testimony from Defendant's Experts, and to redact from its public filings the Confidential Materials and references thereto. Our papers are due today pursuant to the Court's schedule and will be filed simultaneously.

Counsel for both parties have met and conferred and agree to the confidentiality designations of the documents to be filed under seal. The Confidential Materials are in Defendant Sand Canyon Corporation's Memorandum of Law in Opposition to Plaintiff's Motion to Exclude Certain Testimony from Defendant's Experts, the supporting Declaration of Brian Kerr, and the exhibits to that Declaration. These Confidential Materials consist of documents and deposition testimony that the parties have designated as "Confidential" and "Highly Confidential" under the Protective Order (ECF No. 66). Due to size, Exhibits 57 and 58 to the Kerr declaration will be submitted on a CD for Your Honor's consideration.

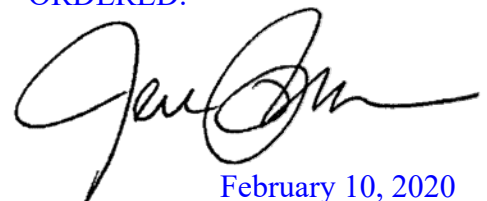
Accordingly, Sand Canyon respectfully requests leave to file the Confidential Materials under seal.

Respectfully submitted,

/s/ Michael Calhoon
Michael Calhoon

The application is temporarily GRANTED. The Court will determine whether to keep the materials under seal when deciding the underlying motion. The Clerk of Court is directed to terminate ECF No. 363. SO ORDERED.

cc: All Counsel (by ECF)



February 10, 2020